

Boriskie has knowledge regarding Jane Draycott's discrimination claims, harassment

claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Brian Williamson
Address: Unknown
Telephone: Unknown

Williamson has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Rick Flanagan
Address: Unknown
Telephone: Unknown

Flanagan has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Isidro Tamez
Address: Unknown
Telephone: Unknown

Tamez has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Terry Garrison
Address: Unknown
Telephone: Unknown

Garrison has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Captain Ponce
Address: Unknown
Telephone: Unknown

Ponce has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Robert Castleberry
Address: Unknown
Telephone: Unknown

Castleberry has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Robert Vara
Address: Unknown
Telephone: Unknown

Vara has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Greg Headberg
Address: Unknown
Telephone: Unknown

Headberg has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Chief Julian
Address: Unknown
Telephone: Unknown

Julian has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Erih Henshel
Address: Unknown
Telephone: Unknown

Henshel has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Elmer Williams
Address: Unknown
Telephone: Unknown

Henshel has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Berlyn Caylor-Strong
Address: Unknown
Telephone: Unknown

Caylor-Strong has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Eddie Ramirez
Address: Unknown
Telephone: Unknown

Ramirez has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Captain Gonzales
Address: Unknown
Telephone: Unknown

Gonzales has knowledge regarding Paula Keyes' discrimination claims, harassment

claims and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Nefatera Alexander
Address: Unknown
Telephone: Unknown

Alexander has knowledge regarding Paula Keyes' discrimination claims, harassment claims and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant

Robin Allen
Address: Unknown
Telephone: Unknown

Allen has knowledge regarding Paula Keyes' discrimination claims, harassment claims and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Discovery is ongoing, and Plaintiff will supplement the list as discovery progresses in accordance with the Federal Rules of Civil Procedure.

RESPONSE:

- ii. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

RESPONSE: Will supplement at a later date.

- iii. A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

RESPONSE: Will supplement at a later date.

- iv. **For Inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action to indemnify or reimburse for payments made to satisfy the judgment.**

RESPONSE: None.

Respectfully submitted,

/s/ Joseph Y. Ahmad

Joseph Y. Ahmad
Texas Bar No. 00941100
Federal ID: 11604
AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING P.C
1221 McKinney Street, Suite 2500
Houston, Texas 77010
Telephone: 713-655-1101
Facsimile: 713-655-0062
joeahmad@azalaw.com

Of Counsel:

AHMAD & CAPODICE, PLLC
Nasim Ahmad
Texas Bar No. 24014186
nahmad@ahmad-capodice.com
Dwain Capodice
Texas Bar No. 24031915
dcapodice@ahmad-capodice.com
24900 Pitkin, Suite 300
The Woodlands, Texas 77386
Telephone: 832-767-3207
Facsimile: 281-864-4379

ATTORNEYS FOR PLAINTIFFS AND
INTERVENORS, JANE DRAYCOTT AND
PAULA KEYES

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd of June, 2018, a true and correct copy of the foregoing document was served on all counsel of record as follows:

Jeremy Patrick Monteiro
jeremy.monteiro@usdoj.gov
US Dept of Justice
Civil Rights Division, Employment Litigation Section
950 Pennsylvania Ave NW
Washington, DC 20530

Torie Alisa Atkinson
Torie.Atkinson@usdoj.gov
US Dept of Justice
Civil Rights Division, Employment Litigation Section
950 Pennsylvania Ave NW, PHB 4035
Washington, DC 20002

Keith Edward Wyatt
keith.wyatt@usdoj.gov
Office of U S Attorney
1000 Louisiana, Ste 2300
Houston, TX 77002

Attorneys for Plaintiff USA

Donald J Fleming
don.fleming@houstontx.gov
Deidra Norris Sullivan
deidra.sullivan@houstontx.gov
City of Houston Legal Department
PO Box 368
Houston, TX 77001-0368

Attorneys for Defendant

/s/ Joseph Y. Ahmad